

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

:

VS.

CR. No. 16 – 11 M

JASON BOUDREAU

:

MOTION TO CONTINUE EMPANELMENT AND EXTEND TIME FOR FILING
MOTIONS

Now comes Jason Boudreau, the Defendant in the above captioned matter, and moves this Honorable Court to continue the empanelment date and extend time for the filing of pretrial motions in this matter, for a period of 60 days. Mr. Boudreau submits the attached memorandum in support of this request.

The government, through AUSA Richard Rose, has no objection to the granting of this Motion.

Respectfully submitted
Jason Boudreau
By his attorney,

/s/ Olin Thompson #5684
Assistant Federal Defender
10 Weybosset St., Ste. 300
Providence, RI 02903
(401) 528-4281
FAX 528-4285
olin_thompson@fd.org

CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to Richard Rose, Assistant United States Attorney, on May 11, 2016

/s/ Olin Thompson

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

:

VS.

CR. No. 16 – 11 M

JASON BOUDREAU

:

MEMORANDUM IN SUPPORT OF MOTION TO CONTINUE IMPANELMENT AND
EXTEND TIME FOR FILING MOTIONS

Mr. Boudreau has moved this Honorable Court to continue the empanelment date and extend the time for filing pretrial motions in this matter. In support of this request, counsel states that he requires additional time to research and draft pre-trial Motions. Counsel's time to spend on this case has been severely constrained due to work in other cases, specifically the hundreds of separate post-conviction reviews and potential filings due by June 24, 2016 based on United States v. Samuel Johnson, 135 S.Ct. 2551 (June 26, 2015).

The time requested is in the ends of justice, outweighing the public and the defendant's interest in a speedy trial, and is therefore excludable under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A).

Respectfully submitted
Jason Boudreau
By his attorney,

/s/ Olin Thompson #5684
Assistant Federal Defender
10 Weybosset St., Ste. 300
Providence, RI 02903
(401) 528-4281
FAX 528-4285
olin_thompson@fd.org

CERTIFICATION

I hereby certify that a copy of this motion was delivered by electronic notification to Richard Rose, Assistant United States Attorney, on May 11, 2016

/s/ Olin Thompson